

EXHIBIT A

S. Grigsby E-mail to
M. Dell'Angelo dated
April 7, 2017

From: [Stacey Grigsby](#)
To: ["Michael Dell"Angelo](#); [Marcy Norwood Lynch](#); [Nicholas Widnell](#); [Suzanne Jaffe Nero](#); [Colby Williams](#)
Cc: [Matthew Weiler](#); [Kevin Rayhill](#); [Joseph Saveri](#); [Eric Cramer](#); [Patrick Madden](#); [Ben Brown](#); [Richard A. Koffman](#); [Daniel Silverman](#); [Robert C. Maysey](#); [Jerome Elwell \(jelwell@warnerangle.com\)](#); [Don Springmeyer](#); [Mark R. Suter](#)
Subject: RE: Le v. Zuffa
Date: Friday, April 07, 2017 4:46:34 PM
Attachments: [Le v. Zuffa DRAFT Joint Stipulation and Proposed Order Re Authenticity of Documents v2.docx](#)

Hello Michael,

We have minor edits to the stipulation in redline attached. If those are fine with you, you have authorization to sign on my behalf and file.

In terms of the deposition issue, I am available to discuss on Monday morning before 11 am EDT.

Thank you,

Stacey

Stacey K. Grigsby

Partner

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From: Michael Dell'Angelo [<mailto:mdellangelo@bm.net>]

Sent: Friday, April 07, 2017 3:23 PM

To: Stacey Grigsby; Marcy Norwood Lynch; Nicholas Widnell; Suzanne Jaffe Nero; Perry Grossman; Colby Williams

Cc: Matthew Weiler; Kevin Rayhill; Joseph Saveri; Eric Cramer; Patrick Madden; Ben Brown; Richard A. Koffman; Daniel Silverman; Robert C. Maysey; Jerome Elwell (jelwell@warnerangle.com); Don Springmeyer; Mark R. Suter

Subject: RE: Le v. Zuffa

Stacey:

Thank you for your response.

Please let us know the signatory for your client and if we have authorization to apply an electronic signature and efile the proposed stipulation.

Thank you for working on dates for the custodian of records deponent. We are fine with having the deposition at your offices in Las Vegas.

We cannot agree to limit our proposal to third parties. However, we think it may be productive to discuss the issue. Are you available on Monday?

Regards,

Michael

Michael Dell'Angelo

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From: Stacey Grigsby [<mailto:SGrigsby@BSFLLP.com>]

Sent: Friday, April 7, 2017 2:25 PM

To: Michael Dell'Angelo <mdellangelo@bm.net>; Marcy Norwood Lynch <mlynch@BSFLLP.com>; Nicholas Widnell <NWidnell@BSFLLP.com>; Suzanne Jaffe Nero <snero@BSFLLP.com>; Perry Grossman <pgrossman@BSFLLP.com>; Colby Williams <jcw@campbellandwilliams.com>

Cc: Matthew Weiler <MWeiler@saverilawfirm.com>; Kevin Rayhill <krayhill@saverilawfirm.com>; Joseph Saveri <jsaveri@saverilawfirm.com>; Eric Cramer <ecramer@bm.net>; Patrick Madden <pmadden@bm.net>; Ben Brown <BBrown@cohenmilstein.com>; Richard A. Koffman <rkoffman@cohenmilstein.com>; Daniel Silverman <DSilverman@cohenmilstein.com>; Robert C. Maysey <rmaysey@warnerangle.com>; Jerome Elwell (jelwell@warnerangle.com) <jelwell@warnerangle.com>; Don Springmeyer <DSpringmeyer@wrslawyers.com>; Mark R. Suter <msuter@bm.net>

Subject: RE: Le v. Zuffa

Counsel:

Defendant will agree to the stipulation concerning the authentication of documents.

In your email below, you also inquire about deposing Zuffa's custodian of records. We will follow up with you on Monday on potential dates, but we would like to have the deposition in Boies Schiller Flexner LLP's Las Vegas office.

Finally, you have asked whether Zuffa will agree to take certain depositions off the calendar with the agreement that the parties can depose witnesses on the opposing party's witness list for 3.5 hours. We are willing to accept this agreement *for third parties* only. If you would like to discuss further, we would be happy to do so.

Best,
Stacey

Stacey K. Grigsby

Partner

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From: Michael Dell'Angelo [<mailto:mdellangelo@bm.net>]

Sent: Thursday, April 06, 2017 6:25 PM

To: Marcy Norwood Lynch; Nicholas Widnell; Suzanne Jaffe Nero; Stacey Grigsby; Perry Grossman; Colby Williams

Cc: Matthew Weiler; Kevin Rayhill; Joseph Saveri; Eric Cramer; Patrick Madden; Ben Brown; Richard A. Koffman; Daniel Silverman; Robert C. Maysey; Jerome Elwell (jelwell@warnerangle.com); Don Springmeyer; Mark R. Suter

Subject: Le v. Zuffa

Counsel:

Attached please find a proposed draft joint stipulation regarding the authentication of documents produced by the parties. We believe that the proposed stipulation will eliminate the need for voluminous requests for admission to otherwise be served tomorrow and substantially streamline the remaining depositions and trial.

Also, Plaintiffs would like to schedule a deposition of Zuffa's custodian of records. Please provide us with proposed dates and a location. If Zuffa is willing stipulate to the authenticity of its documents, the custodian of records deposition will be substantially streamlined.

Finally, Plaintiffs were preparing to notice a number of additional depositions during the remaining weeks of the operative discovery period. However, we believe that it may be more efficient to take certain of those depositions off calendar subject to an agreement along the following lines. With respect to any witness who has not been deposed in the litigation but who is identified on either party's witness list for trial, the witness may be deposed by the opposing party (i.e., the party on whose witness list the witness does not appear), for 3.5 hours in advance of trial. In the event that a witness has not been deposed in the litigation and appears on both parties' witness list, each party may depose the witness for up to 3.5 hours, for a maximum of 7 hours, in advance of trial. To the extent that a Rule 45 subpoena is necessary to secure the deposition of any such witness, the parties shall not challenge the service of the subpoena on the basis the period for fact discovery is closed.

In light of the agreed upon April 7 deadline to serve written discovery, please let us know Zuffa's position regarding the proposed stipulation by 3:00 pm ET tomorrow.

Regards,

Michael

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